

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	Christopher Blazeyewski Diane Blazeyewski Debtor	Case No.: 22-21724-CMB
	SN Servicing Corporation as Servicer for Limosa LLC Movant	Chapter: 13
	Christopher Blazeyewski Diane Blazeyewski Ronda J. Winnecur, Trustee Respondents	Judge Carlota M. Bohm

OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that SN Servicing Corporation as Servicer for Limosa LLC (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 111 Kaplan Avenue, Pittsburgh, PA 15227, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor’s proposed plan is insufficient to provide for the claim of Secured Creditor. The objecting creditor is due arrears of approximately \$53,550.12 set forth in a Claim to be filed by the Claims Deadline.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: October 20, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	Christopher Blazeyewski Diane Blazeyewski Debtor	Case No.: 22-21724-CMB
	SN Servicing Corporation as Servicer for Limosa LLC Movant	Chapter: 13
	Christopher Blazeyewski Diane Blazeyewski Ronda J. Winneccour, Trustee Respondents	Judge Carlota M. Bohm

CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

I certify under penalty of perjury that I caused to be served the above captioned pleading on the parties at the addresses specified below or on the attached list on October 20, 2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading “Service by NEF,” and the full name and complete postal address for each party served by mail, is listed under the heading “Service by First-Class Mail.”

EXECUTED ON: October 20, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

SERVICE LIST

Service by NEF

Paul W. McElrath, Jr.
McElrath Legal Holdings, LLC.
1641 Saw Mill Run Boulevard
Pittsburgh, PA 15210
Debtor's Attorney

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219
Trustee

Office of the United States Trustee
Liberty Center.
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222
U.S. Trustee

Service by First-Class Mail

Christopher Blazeyewski
111 Kaplan Avenue
Pittsburgh, PA 15227
Debtor

Diane Blazeyewski
111 Kaplan Avenue
Pittsburgh, PA 15227
Joint Debtor